

## EXHIBIT A

1 STATE OF OHIO  
2 IN THE COURT OF COMMON PLEAS OF CUYAHOGA COUNTY  
3 CIVIL DIVISION

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4 JAMES SHELTON,  
5 11304 Hessler Road  
6 Cleveland, OH 44106  
7 Plaintiff,  
8 vs.  
9 BLINDBID INC d/b/a TCPA LITIGATOR,  
10 LIST  
11 405 Cherry Hills Way  
12 Colorado Springs, CO 80921

13 MICHAEL CONVEY O'HARE  
14 405 Cherry Hills Way  
15 Colorado Springs, CO 80921

16 Defendants.

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TRANSCRIPT OF AUDIO RECORDINGS  
TRANSCRIBED: MAY 15, 2020

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TRANSCRIPT PROVIDED BY:  
Stevens-Koenig Reporting  
A Veritext Company  
700 17th Street, Suite 1750  
Denver, Colorado 80202  
303-988-8470

1 (Beginning of audio recording.)

2 MR. SHELTON: See -- look -- right. This is  
3 what I would do. So I type in your name.

4 You live in Colorado Springs?

5 MR. O'HARE: Yes.

6 MR. SHELTON: That's a super nice area. I've  
7 been there a few times. I -- my dad is good friends with a guy  
8 that was in the Air Force. He's a colonel. He's retired now.  
9 But they were stationed on the U.S. Air Force base. And so we  
10 went out there and stayed at their place for a couple days, and  
11 then we went skiing, which was really, really great. A really  
12 good time. So I'm somewhat familiar with the area.

13 Yes, I would -- I would run you -- I would  
14 see -- okay. You know, you have a house in Colorado Springs.  
15 Loan him out 340,000. So then I would type in your property,  
16 pull it up on sale. It's worth 512,000. So I'd be like, All  
17 right, that's a pretty nice house. You have, like, a lot of  
18 people -- I don't know if you're (inaudible).

19 MR. O'HARE: But -- but -- but, James --  
20 because the house -- when I bought it for 340, it was worth  
21 340. Okay. It went up --

22 MR. SHELTON: Right.

23 MR. O'HARE: -- in the past three years.

24 MR. SHELTON: It's going to go up, and then  
25 it's going to go done down, because the real estate market is

1 going to go down.

2 MR. O'HARE: Yeah. So -- but, I mean,  
3 it's -- but -- but I -- you know, if my value of the house went  
4 up 100,000 the last three years, it's not because -- you know,  
5 it's more luck than anything else, you know. It's just a lot  
6 of people wanted to move out here.

7 MR. SHELTON: Yeah. And you don't -- you don't  
8 have -- you don't have any expensive vehicles. So I would say  
9 you're not rich by any means. But if I had a judgment against  
10 you, I mean, I 100 percent could put a lien against your house.

11 And -- and that would be a sizable amount of  
12 equity that I could conceivably take, if it's -- if it's really  
13 worth that much. But that's just the -- so that would be my  
14 analysis. Right?

15 I would say, Okay, you have two six- or  
16 seven-year-old cars. I would just kind of look at you like,  
17 All right, you know. But depending on collectability, I look  
18 at it as where someone lives and what they're driving, what  
19 their lifestyle is.

20 So --

21 MR. O'HARE: Yeah. We --

22 MR. SHELTON: -- that's a far cry  
23 from -- that's a far cry from someone that lives in Calabasas;  
24 or Beverly Hills; or, you know, Santa Anna, California, for  
25 example; Newport Beach.

1 (End of audio recording.)

2 \* \* \* \* \*

3 (Beginning of audio recording.)

4 MR. SHELTON: I'll tell you what,  
5 because -- because you run -- because you can run them -- you  
6 can run her on Lexis -- not the Lexis; on TLO.

7 (End of audio recording.)

8 \* \* \* \* \*

9 (Beginning of audio recording.)

10 MR. O'HARE: I don't know why I --

11 MR. SHELTON: I have -- I have Clear Choice  
12 Credit. For 10 bucks, you can run -- it's \$9.50 each -- you  
13 can run -- you can pull a credit report, TransUnion or Equifax.  
14 All you need to have is Social, date of birth, address. It's  
15 very --

16 MR. O'HARE: Okay. Well, take --

17 MR. SHELTON: -- very easy.

18 (End of audio recording.)

19 \* \* \* \* \*

20 (Beginning of audio recording.)

21 MR. SHELTON: I understand. It's like -- I  
22 research these people a lot before I even write them a demand  
23 letter, because I want to know, Okay, do they own real  
24 property? Do they have bank accounts? Do they have money?  
25 How -- how big is their company? How many employees do they

1 have?

2 All that -- I research that stuff in advance.

3 And if they're a small -- if they're -- if they're driving a  
4 brand new Mercedes or -- or a Lambo or something, or they're  
5 living in a brand new house, then they can afford to pay me.

6 If there's someone living in their apartment,  
7 has no money, is driving a 1995 truck, I mean --

8 (End of audio recording.)

9 \* \* \* \* \*

10 (Beginning of audio recording.)

11 MR. O'HARE: How do you -- how do you justify  
12 that --

13 MR. SHELTON: Yeah. No. You're right. No.  
14 We're pillaging them. No. We're absolutely pillaging them. I  
15 mean, that's -- that's the point.

16 (End of audio recording.)

17 \* \* \* \* \*

18 (Beginning of audio recording.)

19 MR. SHELTON: Meanwhile, I know -- I know where  
20 the person banks before I even -- before I even file the case,  
21 and how much money they have.

22 (End of audio recording.)

23 \* \* \* \* \*

24 (Beginning of audio recording.)

25 MR. SHELTON: I just justify it as, Hey, I want

1 to make some money, and, I mean, that's --

2 (End of audio recording.)

3 \* \* \* \* \*

4 (Beginning of audio recording.)

5 MR. O'HARE: What? Okay. You find the  
6 company. They call you. I mean, are you then going to go say,  
7 Hey, Craig -- Craig Cunningham or these other -- Rayburn  
8 (phonetic) or whoever -- Hey, Michael, here's an easy target?

9 MR. SHELTON: Oh, yeah. Absolutely. Because  
10 what we do is -- not you in particular, but, like, what -- what  
11 we'll do is we'll say, Hey, yeah, these guys just paid me "X"  
12 number of dollars, or, Hey, you know, I just collected a  
13 judgment against these guys. I just made \$20,000. Yo. Any of  
14 you guys got any calls? Yeah. Sure have. Let's go after  
15 them.

16 (End of audio recording.)

17 \* \* \* \* \*

18 (Beginning of audio recording.)

19 MR. O'HARE: Well, what --

20 MR. SHELTON: Here's the thing -- here's the  
21 thing: Like, I sue the people individually and get -- get  
22 individual liability. So that's the first hurdle. So you can  
23 close your company up, but I'm going -- but I'm going to have a  
24 judgment against you personally. And that's going -- that's  
25 going to mean that I can still levy your personal account.

1                   If you own a real -- if you own real property,  
2 I can put a lien against it, or I can even -- I mean, I can  
3 take -- take it if I want. If -- if there's equity in it, I  
4 can take the house. I mean, that -- there's a ton of  
5 weapons --

6                   MR. O'HARE: Would you do that? Would you do  
7 that?

8                   MR. SHELTON: -- that I can use.

9                   Yeah. We're in the process of doing it to  
10 someone in -- in Southern California right now. But  
11 they're -- they're scumbags. They're -- have you -- do you  
12 have any extended auto warranty --

13                   (End of audio recording.)

14                   \* \* \* \* \*

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1 REPORTER'S CERTIFICATE  
2  
3  
4

5 I, Laurel S. Tubbs, do hereby certify that I am a  
6 Professional Shorthand Reporter and Notary Public within the  
7 State of Colorado.

8 I further certify that the foregoing transcript  
9 constitutes a true and correct transcript to the best of my  
10 ability to hear and understand the audio recording.

11 I further certify that I am not related to, employed  
12 by, nor of counsel for any of the parties or attorneys herein,  
13 nor otherwise interested in the result of the within action.

14 My commission expires September 1, 2023.  
15  
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21 LAUREL S. TUBBS  
22  
23 Registered Professional Reporter  
24 and Notary Public  
25

## [1 - guys]

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## [hear - sue]

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## **EXHIBIT B**

**JACOVETTI LAW, P.C.**  
194 Old Country Road  
Mineola, New York 11501  
(516) 744-5454 telephone / (877) 212-9156 facsimile  
cs@jacovettilaw.com

May 1, 2020

Heidarpour Law Firm, PLLC  
1300 Pennsylvania Avenue, NW 190-318  
Washington, DC 20004

VIA FIRST CLASS MAIL.

RE: Violation of the Telephone Consumer Protection Act

Dear Andrew:

Jacovetti Law, P.C. sends this letter in response to your demand letter sent to my clients dated April 14, 2020. As described in my response letter dated October 11, 2019 with respect to your two previous baseless demands, this instant demand to is baseless.

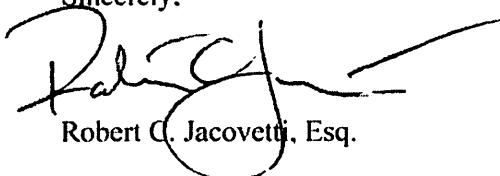
As previously stated it is my clients business practice to purchase and use "opt-in" data records that are then "scrubbed" both against an internal database and again against the National Do-Not-Call (DNC) Registry. Only after a record is successfully processed through this procedure is the data used to make HAND-DIALED calls. Subsequently if a representative is advised to place the telephone number on a DNC list - that is done so immediately.

**April 14, 2020**

In response to your demand contained in your April 2020 letter, the telephone number you stated as my client's telephone number (973-348-3770), belongs to another company. See attached. This number does not belong to my client. Additionally, the wireless telephone number 831-737-7919 is not included in any records that are in my client's possession.

If you wish to discuss these demands in a courteous manner, I am open to doing so in good faith.

Sincerely,



Robert C. Jacovetti, Esq.

encs.

cs@jacovettilaw.com

4/28/2020

Who called you from 9733483770 (+19733483770) ? [shouldianswer.com](https://www.shouldianswer.com)



SHOULD I ANSWER?

CALLED YOU FROM 9733483770 ?

**+1 973-348-3770**

NEGATIVE TELEMARKETER  
fixed or mobile line  
United States, New Jersey

umber 9733483770 has negative rating. 19 users rated it as negative. Approximated caller location is WARREN, SOMERSI ZIP code is 07059. It's registered in AT&T LOCAL. This phone number is mostly categorized as Telemarketer (9 times), ted call (6 times) and Financial services (2 times). This ratings are based on reports of visitors of this web site and report: our protection against unwanted calls which is available for free on [Google Play](#).

## UNITY REVIEWS

of the reviews are written by real users of our applications or visitors of this website. The content of reviews contains rea ice with the phone number. In most cases the reviews are short because written on mobile devices. Short reviews are also nd can help others. Please be aware that reviews violating our terms of use are removed or censored.

Horrible, disgusting, vulgar comments. They don't stop calling! (Financial services) *dan*

04

They keep calling trying to give me a business loan. You argue with them time after time to stop calling and yet they don't stop. They will have another # call immediately from Colorado just to \*\*\*\* you off further. They make \*\*\*\* comments sexually toward my spouse eve though I'm not married. I wish they would go away!!!

Financial services *SAUser*

2 m

Telemarketer *FTC DNC Complaint*

3 m

|                                                                      |                                                                                                                                         |      |
|----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|------|
| 4/28/2020                                                            | Who called you from 9733483770 (+19733483770) ? <a href="https://www.shouldianswer.com/phone-number/9733483770">I shouldianswer.com</a> |      |
| Telemarketer 174.221.133.xxx<br>business debt adjuster               |                                                                                                                                         | 4 m  |
| Unsolicited call 174.254.195.xxx<br>business loans                   |                                                                                                                                         | 6 m  |
| Unsolicited call <i>FTC DNC Complaint</i>                            |                                                                                                                                         | 6 m  |
| Unsolicited call <i>FTC DNC Complaint</i>                            |                                                                                                                                         | 6 m  |
| Telemarketer 107.77.226.xxx<br>get out boy                           |                                                                                                                                         | 6 m  |
| Unsolicited call <i>FTC DNC Complaint</i>                            |                                                                                                                                         | 7 m  |
| Telemarketer <u>SA user</u>                                          |                                                                                                                                         | 7 m  |
| Scam call <i>miss4nn</i><br>keeps calling but never leaves a message |                                                                                                                                         | 8 m  |
| Telemarketer <i>FTC DNC Complaint</i>                                |                                                                                                                                         | 9 m  |
| Telemarketer <i>FTC DNC Complaint</i>                                |                                                                                                                                         | 13 m |
| Unsolicited call 174.58.19.xxx<br>hangs up early                     |                                                                                                                                         | 16 m |
| Telemarketer 24.186.211.xxx<br>Brooklyn driving specialist           |                                                                                                                                         | 16 m |

4/28/2020

Who called you from 9733483770 (+19733483770) ? shouldianswer.com

Unsolicited call 172.58.217.xxx  
Unknown caller,no message left

17 m

## UR RATING

Keep the information just for yourself. Describe Your experience using our form and You will help also the other users. That review.

number call you?

NO

## YOU SHOULD KNOW

important to be prepared to new threats. That's why our team writes stories which could help you to identify and protect a frauds. Here are some tips to our stories, but feel free to visit our stories section for next useful tips.

[Your child's first cell phone. A useful guide for parents](#)

[Who called? Find out for free](#)

[How do Americans fight robocalls? Read the latest data](#)

[More Stories »](#)

## SIMILAR PHONE NUMBERS

nes the unwanted calls are conducted from similar phone numbers - good to know! Here is a list of similar phone number stored in our database.

|                            |                            |                            |                            |                            |                            |
|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|
| <a href="#">9733483764</a> | <a href="#">9733483765</a> | <a href="#">9733483766</a> | <a href="#">9733483767</a> | <a href="#">9733483768</a> | <a href="#">9733483769</a> |
| <a href="#">9733483771</a> | <a href="#">9733483772</a> | <a href="#">9733483773</a> | <a href="#">9733483774</a> | <a href="#">9733483775</a> | <a href="#">9733483776</a> |

4/28/2020

Who called you from 9733483770 (+19733483770) ? [shouldianswer.com](https://www.shouldianswer.com)

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1300 Pennsylvania Ave. NW 190-318  
Washington, D.C. 20004  
AHeidarpour@HLFirm.com  
TEL: (202) 234-2727



Andrew W. Heidarpour, Esq  
D.C BAR # 1022137

April 14, 2020

**Via Email: [troy@centuryrelief.com](mailto:troy@centuryrelief.com); [louis@centuryrelief.com](mailto:louis@centuryrelief.com); [adam@centuryrelief.com](mailto:adam@centuryrelief.com);**  
**[terrell@centuryrelief.com](mailto:terrell@centuryrelief.com); [grace@centuryrelief.com](mailto:grace@centuryrelief.com)**

**Century Relief  
ATTN: LEGAL DEPARTMENT**

**Re: Violation of the Telephone Consumer Protection Act**

**To Whom It May Concern:**

My Client, Mariano Benitez (Client), wishes to bring to your attention a telemarketing concern. In January and March of 2020, my Client received unsolicited telemarketing calls to their wireless line 831-737-7919 from your company, or some company on your behalf, from number 973-348-3770. My Client did not provide their consent to your company to make these telemarketing calls. It is my understanding that according to the Telephone Consumer Protection Act, it is illegal to make marketing calls to any wireless line using an ATDS or Pre-Recorded message without first obtaining the express written consent of the recipient or business. Furthermore, the number in question is also on the National Do-Not-Call (DNC) Registry, thus constituting DNC violations as well.

Please forward to my attention all documents that evidence any purported consent to receive telemarketing calls from your company, as well as any other documents that support your position there is no claim against your company, if that is your contention. Before my Client proceeds with a formal claim, they wish to give your company the opportunity to explain their actions. Please forward this information to my attention by April 21, 2020. If we do not hear from you at that time, my Client will consider all legal remedies available, including but not limited to, filing a claim in Federal Court. By sending this letter, you as well as any third parties that you worked with related to the telephone campaign at issue, are hereby notified of your obligation to preserve all electronic and non-electronic files regarding this claim. This includes, but is not limited to, all e-mail communications and records reflecting telephone calls.

Sincerely,

Heidarpour Law Firm, PLLC



Andrew W. Heidarpour, Esq

**JACOVETTI LAW, P.C.**  
194 Old Country Road  
Mineola, New York 11501  
(516) 744-5454 telephone / (877) 212-9156 facsimile  
cs@jacobettilaw.com

October 11, 2019

Heidarpour Law Firm, PLLC  
1300 Pennsylvania Avenue, NW 190-318  
Washington, DC 20004

VIA FIRST CLASS MAIL

RE: Violation of the Telephone Consumer Protection Act

Dear Andrew:

Jacovetti Law, P.C. sends this letter in response to your demand letters sent to my clients dated June 24, 2019 and October 8, 2019. First, I must note that this is my first experience during my years of practice that an opposing counsel refused to speak with me about a matter on a telephone call. Your lack of professional courtesy is noteworthy.

I have conducted an interview with my clients. Please be advised that it is my clients business practice to purchase and use "opt-in" data records that are then "scrubbed" both against an internal database and again against the National Do-Not-Call (DNC) Registry. Only after a record is successfully processed through this procedure is the data used to make HAND-DIALED calls. Subsequently if a representative is advised to place the telephone number on a DNC list - that is done so immediately.

**June 24, 2019**

In response to your demand contained in your June 2019 letter, the telephone number 510-540-7210 in the control of your corporate client Abante Rooter and Plumbing, Inc. was placed on an internal DNC list on February 19, 2019 at 12:07 pm. No further hand-dialed calls were placed to this telephone number by my client.

**October 8, 2019**

In response to your demand contained in your October 2019 letter, the telephone number 805-520-9210 in the control of your client Terry Fabricant was placed on a internal DNC list on October 7, 2019 at 12:10 pm. No further hand-dialed calls were placed to this telephone number by my client.

**JACOVETTI LAW, P.C.**  
194 Old Country Road  
Mineola, New York 11501  
(516) 744-5454 telephone / (877) 212-9156 facsimile  
[cs@jacobettilaw.com](mailto:cs@jacobettilaw.com)

If you wish to discuss these demands in a courtesy manner, I am open to doing so in good faith.

Sincerely,



Robert C. Jacobetti, Esq.

encs.

1300 Pennsylvania Ave. NW 190-318  
Washington, D.C. 20004  
AHeidarpour@HLFirm.com  
TEL: (202) 234-2727



Andrew W. Heidarpour, Esq  
D.C BAR # 1022137

October 8, 2019

**Via Email:** [louis@centuryrelief.com](mailto:louis@centuryrelief.com); [adam@centuryrelief.com](mailto:adam@centuryrelief.com); [louis@centuryrelief.com](mailto:louis@centuryrelief.com);  
[kevin@centuryrelief.com](mailto:kevin@centuryrelief.com); [grace@centuryrelief.com](mailto:grace@centuryrelief.com)

**Century Relief**  
**ATTN: LEGAL DEPARTMENT**

**Re: Violation of the Telephone Consumer Protection Act**

To Whom It May Concern:

My Client, Terry Fabricant (Client), wishes to bring to your attention a telemarketing concern. In September and October of 2019, my Client received multiple unsolicited telemarketing calls to their wireless line 805-520-9210, from your company, or some company on your behalf, from numbers 805-870-9176, 646-506-3453, 201-579-5221, 805-870-9176, and 347-707-7958. My Client did not provide their consent to your company to make these telemarketing calls. It is my understanding that according to the Telephone Consumer Protection Act, it is illegal to make marketing calls to any wireless line using an ATDS or Pre-Recorded message without first obtaining the express written consent of the recipient or business. Furthermore, the number in question is also on the National Do-Not-Call (DNC) Registry, thus constituting DNC violations as well.

Please forward to my attention all documents that evidence any purported consent to receive telemarketing calls from your company, as well as any other documents that support your position there is no claim against your company, if that is your contention. Before my Client proceeds with a formal claim, they wish to give your company the opportunity to explain their actions. Please forward this information to my attention by October 15, 2019. If we do not hear from you at that time, my Client will consider all legal remedies available, including but not limited to, filing a claim in Federal Court. By sending this letter, you as well as any third parties that you worked with related to the telephone campaign at issue, are hereby notified of your obligation to preserve all electronic and non-electronic files regarding this claim. This includes, but is not limited to, all e-mail communications and records reflecting telephone calls.

Sincerely,

Heidarpour Law Firm, PLLC



Andrew W. Heidarpour, Esq

1300 Pennsylvania Ave. NW 190-318  
Washington, D.C. 20004  
AHeidarpour@HLFirm.com  
TEL: (202) 234-2727



Andrew W. Heidarpour, Esq  
D.C BAR # 1022137

June 24, 2019

**Via Email: [grace@businessdebtexperts.com](mailto:grace@businessdebtexperts.com); [info@businessdebtexperts.com](mailto:info@businessdebtexperts.com);**  
**[barry@businessdebtexperts.com](mailto:barry@businessdebtexperts.com)**

**Business Debt Expert / Renaissance Capital Group, LLC**  
**ATTN: LEGAL DEPARTMENT**  
**1644 East 14<sup>th</sup> St**  
**Brooklyn, NY 11229**

**Re: Violation of the Telephone Consumer Protection Act**

**To Whom It May Concern:**

My Client, Abante Rooter and Plumbing, Inc (Client), wishes to bring to your attention a telemarketing concern. In January and February of 2019, my Client received multiple unsolicited telemarketing calls to their wireless line 510-540-7210, from your company, or some company on your behalf. My Client did not provide their consent to your company to make these telemarketing calls. It is my understanding that according to the Telephone Consumer Protection Act, it is illegal to make marketing calls to any wireless line using an ATDS or Pre-Recorded message without first obtaining the express written consent of the recipient or business. Furthermore, the number in question is also on the National Do-Not-Call (DNC) Registry, thus constituting DNC violations as well.

Please forward to my attention all documents that evidence any purported consent to receive telemarketing calls from your company, as well as any other documents that support your position there is no claim against your company, if that is your contention. Before my Client proceeds with a formal claim, they wish to give your company the opportunity to explain their actions. Please forward this information to my attention by July 1, 2019. If we do not hear from you at that time, my Client will consider all legal remedies available, including but not limited to, filing a claim in Federal Court. By sending this letter, you as well as any third parties that you worked with related to the telephone campaign at issue, are hereby notified of your obligation to preserve all electronic and non-electronic files regarding this claim. This includes, but is not limited to, all e-mail communications and records reflecting telephone calls.

Sincerely,

Heidarpour Law Firm, PLLC

  
Andrew W. Heidarpour, Esq

**From:** Robert Jacovetti <[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)>  
**Subject:** Re: Pre-Suit Notification of Federal Telemarketing Law Violation  
**Date:** May 29, 2020 at 2:47:46 PM EDT  
**To:** Andrew Heidarpour <[aheidarpour@hlfir.com](mailto:aheidarpour@hlfir.com)>

They are not unlawful.

Again, I think a telephone conversation would be helpful to resolve this amicably.

Regards,  
Robert

Robert Jacovetti, Esq.  
Jacovetti Law, P.C.  
194 Old Country Road  
Mineola, New York 11501  
(516) 744-5454 Telephone  
(877) 212-9156 Facsimile  
[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)  
[www.jacobettilaw.com](http://www.jacobettilaw.com)

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On May 29, 2020, at 2:45 PM, Andrew Heidarpour <[aheidarpour@hlfir.com](mailto:aheidarpour@hlfir.com)> wrote:

Robert, I sent an email on May 11 with four attachments. On May 22, you informed me your client was reviewing the emails. Your client has had 18 days to review a few pages of documents.

What is your client's position regarding those emails?

Regards

----

Andrew Heidarpour  
Heidarpour Law Firm, PLLC  
[www.HLFirm.com](http://www.HLFirm.com)  
[AHeidarpour@HLFirm.com](mailto:AHeidarpour@HLFirm.com)  
[P] [202-234-2727](tel:202-234-2727)

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---

**From:** Robert Jacovetti <[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)>  
**Sent:** Friday, May 29, 2020 2:30 PM  
**To:** Andrew Heidarpour <[aheidarpour@hlfir.com](mailto:aheidarpour@hlfir.com)>  
**Subject:** Re: Pre-Suit Notification of Federal Telemarketing Law Violation

Andrew,

Once again - I believe a telephone conversation would do very well before you take action.

What time are you available to speak next Tuesday?

Regards,  
Robert

Robert Jacovetti, Esq.  
Jacovetti Law, P.C.  
194 Old Country Road  
Mineola, New York 11501  
(516) 744-5454 Telephone

(877) 212-9156 Facsimile  
[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)  
[www.jacobettilaw.com](http://www.jacobettilaw.com)

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On May 29, 2020, at 10:47 AM, Andrew Heidarpour <[aheidarpour@hlfir.com](mailto:aheidarpour@hlfir.com)> wrote:

Hi Robert, any update?

Regards

----

Andrew Heidarpour  
Heidarpour Law Firm, PLLC  
[www.HLFirm.com](http://www.HLFirm.com)  
[AHeidarpour@HLFirm.com](mailto:AHeidarpour@HLFirm.com)  
[P] [202-234-2727](tel:202-234-2727)

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**From:** Robert Jacovetti <[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)>  
**Sent:** Friday, May 22, 2020 10:43 AM  
**To:** Andrew Heidarpour <[aheidarpour@hlfirm.com](mailto:aheidarpour@hlfirm.com)>  
**Subject:** Re: Pre-Suit Notification of Federal Telemarketing Law Violation

Andrew,

I have been out - Forward the emails to my client and they are under review.

I will email you when we return from the Memorial Day holiday.

Regards,  
Robert

Robert Jacovetti, Esq.  
Jacovetti Law, P.C.  
194 Old Country Road  
Mineola, New York 11501  
(516) 744-5454 Telephone  
(877) 212-9156 Facsimile  
[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)  
[www.jacobettilaw.com](http://www.jacobettilaw.com)

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On May 20, 2020, at 12:32 PM, Andrew Heidarpour <[aheidarpour@hlfirm.com](mailto:aheidarpour@hlfirm.com)> wrote:

Robert, we have waited long enough.

Are you authorized to accept service?

Regards

----

Andrew Heidarpour  
Heidarpour Law Firm, PLLC  
[www.HLFirm.com](http://www.HLFirm.com)  
[AHeidarpour@HLFirm.com](mailto:AHeidarpour@HLFirm.com)  
[P] [202-234-2727](tel:202-234-2727)

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---

**From:** Andrew Heidarpour <[aheidarpour@hlfirm.com](mailto:aheidarpour@hlfirm.com)>  
**Sent:** Friday, May 15, 2020 7:12 PM  
**To:** Robert Jacovetti <[rcjesq@jacovettilaw.com](mailto:rcjesq@jacovettilaw.com)>  
**Subject:** Re: Pre-Suit Notification of Federal Telemarketing Law Violation

Any update Robert?

Regards

----

Andrew Heidarpour  
Heidarpour Law Firm, PLLC  
[www.HLFirm.com](http://www.HLFirm.com)  
[AHeidarpour@HLFirm.com](mailto:AHeidarpour@HLFirm.com)  
[P] [202-234-2727](tel:202-234-2727)

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**From:** Andrew Heidarpour <[aheidarpour@hlfirm.com](mailto:aheidarpour@hlfirm.com)>  
**Sent:** Monday, May 11, 2020 1:30 PM  
**To:** Robert Jacovetti <[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)>  
**Subject:** Re: Pre-Suit Notification of Federal Telemarketing Law Violation

They are attached.

----  
Andrew Heidarpour  
Heidarpour Law Firm, PLLC  
[www.HLFirm.com](http://www.HLFirm.com)  
[AHeidarpour@HLFirm.com](mailto:AHeidarpour@HLFirm.com)  
[P] [202-234-2727](tel:202-234-2727)

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---

**From:** Robert Jacovetti <[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)>  
**Sent:** Friday, May 8, 2020 3:01 PM  
**To:** Andrew Heidarpour <[aheidarpour@hlfirm.com](mailto:aheidarpour@hlfirm.com)>  
**Subject:** Re: Pre-Suit Notification of Federal Telemarketing Law Violation

Andrew,

Send me copies of the emails and I will present them to my client.

Regards,

Robert Jacovetti, Esq.  
Jacovetti Law, P.C.

194 Old Country Road  
Mineola, New York 11501  
(516) 744-5454 Telephone  
(877) 212-9156 Facsimile  
[rcjesq@jacovettilaw.com](mailto:rcjesq@jacovettilaw.com)  
[www.jacovettilaw.com](http://www.jacovettilaw.com)

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On May 8, 2020, at 2:51 PM, Andrew Heidarpour <[aheidarpour@hlfir.com](mailto:aheidarpour@hlfir.com)> wrote:

Robert, I would speak with your client again. If they did not call my client, and the number is not your client's, why or how was my client speaking to Troy, Louis, and Mark, all of whom sent emails to the client? All of which are from Century Debt Relief.

Please also confirm your client does not use an Automatic Telephone Dialing System.

Furthermore, my client's number is on the DNC, and was still called.

Regards

----  
Andrew Heidarpour  
Heidarpour Law Firm, PLLC  
[www.HLFir.com](http://www.HLFir.com)  
[AHeidarpour@HLFir.com](mailto:AHeidarpour@HLFir.com)  
[P] [202-234-2727](tel:202-234-2727)

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---

**From:** Robert Jacovetti <[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)>  
**Sent:** Friday, May 8, 2020 2:27 PM  
**To:** Andrew Heidarpour <[aheidarpour@hlfirm.com](mailto:aheidarpour@hlfirm.com)>  
**Subject:** Re: Pre-Suit Notification of Federal Telemarketing Law Violation

Andew,

Didn't you receive the letter? You should have - see attachment.

Regards,  
Robert

Robert Jacovetti, Esq.  
Jacovetti Law, P.C.  
194 Old Country Road  
Mineola, New York 11501  
(516) 744-5454 Telephone  
(877) 212-9156 Facsimile  
[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)  
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On May 8, 2020, at 2:13 PM, Andrew Heidarpour <[aheidarpour@hlfirm.com](mailto:aheidarpour@hlfirm.com)> wrote:

I assume you will not provide a copy?

Service of process will be sent shortly.

Regards

----

Andrew Heidarpour  
Heidarpour Law Firm, PLLC  
[www.HLFirm.com](http://www.HLFirm.com)  
[AHeidarpour@HLFirm.com](mailto:AHeidarpour@HLFirm.com)  
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---

**From:** Andrew Heidarpour <[aheidarpour@hlfirm.com](mailto:aheidarpour@hlfirm.com)>  
**Sent:** Friday, May 1, 2020 3:50 PM  
**To:** Robert Jacovetti <[rcjesq@jacovettilaw.com](mailto:rcjesq@jacovettilaw.com)>  
**Subject:** Re: Pre-Suit Notification of Federal Telemarketing Law Violation

Can a copy be sent via email?

Regards

----

Andrew Heidarpour  
Heidarpour Law Firm, PLLC  
[www.HLFirm.com](http://www.HLFirm.com)

[AHeidarpour@HLFirm.com](mailto:AHeidarpour@HLFirm.com)

[P] [202-234-2727](tel:202-234-2727)

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**From:** Robert Jacovetti <[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)>  
**Sent:** Friday, May 1, 2020 3:35 PM  
**To:** Andrew Heidarpour <[aheidarpour@hlfirm.com](mailto:aheidarpour@hlfirm.com)>  
**Subject:** Re: Pre-Suit Notification of Federal Telemarketing Law Violation

Andrew,

Our response letter is drafted and will be mailed today.

Regards,  
Robert

Robert Jacovetti, Esq.  
Jacovetti Law, P.C.  
194 Old Country Road  
Mineola, New York 11501  
(516) 744-5454 Telephone  
(877) 212-9156 Facsimile  
[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)  
[www.jacobettilaw.com](http://www.jacobettilaw.com)

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On May 1, 2020, at 1:56 PM, Andrew Heidarpour <[aheidarpour@hlfirm.com](mailto:aheidarpour@hlfirm.com)> wrote:

Hi Robert, any update?

Regards

----

Andrew Heidarpour  
Heidarpour Law Firm, PLLC  
[www.HLFirm.com](http://www.HLFirm.com)  
[AHeidarpour@HLFirm.com](mailto:AHeidarpour@HLFirm.com)  
[P] [202-234-2727](tel:202-234-2727)

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**From:** Robert Jacovetti <[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)>  
**Sent:** Tuesday, April 28, 2020 2:37 PM  
**To:** Andrew Heidarpour <[aheidarpour@hlfirm.com](mailto:aheidarpour@hlfirm.com)>  
**Subject:** Re: Pre-Suit Notification of Federal Telemarketing Law Violation

Andrew,

Yes - I am drafting a formal response letter that will be sent to you within the next day or two.

Once again, my client does not use an auto-dialer, nor does my client engage in “Press 1” campaigns.

The telephone number documented in your letter does not appear in my clients system. Finally, the telephone number that you attribute to my client does not belong to my client.

These facts, together with other factual information, will be included in my forthcoming response letter together.

Regards,  
Robert

Robert Jacovetti, Esq.  
Jacovetti Law, P.C.  
194 Old Country Road  
Mineola, New York 11501  
(516) 744-5454 Telephone  
(877) 212-9156 Facsimile  
[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)  
[www.jacobettilaw.com](http://www.jacobettilaw.com)

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On Apr 28, 2020, at 1:53 PM, Andrew Heidarpour <[aheidarpour@hlfirm.com](mailto:aheidarpour@hlfirm.com)> wrote:

Robert, did you investigate the calls?

Regards

----

Andrew Heidarpour  
Heidarpour Law Firm, PLLC  
[www.HLFirm.com](http://www.HLFirm.com)  
[AHeidarpour@HLFirm.com](mailto:AHeidarpour@HLFirm.com)  
[P] [202-234-2727](tel:202-234-2727)

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**From:** Robert Jacovetti <[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)>  
**Sent:** Tuesday, April 21, 2020 1:10 PM  
**To:** Andrew Heidarpour <[aheidarpour@hlfirm.com](mailto:aheidarpour@hlfirm.com)>  
**Subject:** Re: Pre-Suit Notification of Federal Telemarketing Law Violation

Andrew,

Please be advised that due to the pandemic, and the impact that has had on my staff, my response has been delayed. I will respond via letter as soon as practicable.

Attached please find your demand letter dated April 14, 2020, as well as our response letter to the two previous demands sent to my client.

Additionally, it has come to my attention that you are purposely directing demands to my client employees - cease and desist.

Finally, my attempts to communicate with you directly during your previous two demands were rejected by you. I feel that it would helpful if we schedule a telephone call.

Regards,

Robert

Robert Jacovetti, Esq.  
Jacovetti Law, P.C.  
194 Old Country Road  
Mineola, New York 11501  
(516) 744-5454 Telephone  
(877) 212-9156 Facsimile  
[rcjesq@jacobettilaw.com](mailto:rcjesq@jacobettilaw.com)  
[www.jacobettilaw.com](http://www.jacobettilaw.com)

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On Apr 21, 2020, at 12:18 PM, Emil Yashayev <[emil@centuryrelief.com](mailto:emil@centuryrelief.com)> wrote:

This attorney is emailing everybody individually and harassing the employees

----- Forwarded message -----

From: **Louis Abramson** <[louis@centuryrelief.com](mailto:louis@centuryrelief.com)>

Date: Tue, Apr 21, 2020 at 12:18 PM

Subject: Fwd: Pre-Suit Notification of Federal Telemarketing Law Violation

To: Barry Shargel <[barry@centuryrelief.com](mailto:barry@centuryrelief.com)>, Emil Yashayev  
<[emil@centuryrelief.com](mailto:emil@centuryrelief.com)>

----- Forwarded message -----

From: **Andrew Heidarpour** <[aheidarpour@hlfirm.com](mailto:aheidarpour@hlfirm.com)>

Date: Tue, Apr 21, 2020 at 10:55 AM

Subject: Re: Pre-Suit Notification of Federal Telemarketing Law Violation

To: [troy@centuryrelief.com](mailto:troy@centuryrelief.com) <[troy@centuryrelief.com](mailto:troy@centuryrelief.com)>, [louis@centuryrelief.com](mailto:louis@centuryrelief.com) <[louis@centuryrelief.com](mailto:louis@centuryrelief.com)>, [adam@centuryrelief.com](mailto:adam@centuryrelief.com) <[adam@centuryrelief.com](mailto:adam@centuryrelief.com)>, [terrell@centuryrelief.com](mailto:terrell@centuryrelief.com) <[terrell@centuryrelief.com](mailto:terrell@centuryrelief.com)>, [grace@centuryrelief.com](mailto:grace@centuryrelief.com) <[grace@centuryrelief.com](mailto:grace@centuryrelief.com)>

Hi, my firm previously sent correspondence regarding violations of the TCPA, but have yet to receive a response.

Was my prior correspondence received?

Regards

----

Andrew Heidarpour  
Heidarpour Law Firm, PLLC  
[www.HLFirm.com](http://www.HLFirm.com)  
[AHeidarpour@HLFirm.com](mailto:AHeidarpour@HLFirm.com)  
[P] [202-234-2727](tel:202-234-2727)

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---

**From:** Andrew Heidarpour

**Sent:** Tuesday, April 14, 2020 1:56 PM

**To:** [troy@centuryrelief.com](mailto:troy@centuryrelief.com) <[troy@centuryrelief.com](mailto:troy@centuryrelief.com)>; [louis@centuryrelief.com](mailto:louis@centuryrelief.com) <[louis@centuryrelief.com](mailto:louis@centuryrelief.com)>; [adam@centuryrelief.com](mailto:adam@centuryrelief.com) <[adam@centuryrelief.com](mailto:adam@centuryrelief.com)>; [terrell@centuryrelief.com](mailto:terrell@centuryrelief.com) <[terrell@centuryrelief.com](mailto:terrell@centuryrelief.com)>; [grace@centuryrelief.com](mailto:grace@centuryrelief.com) <[grace@centuryrelief.com](mailto:grace@centuryrelief.com)>

**Subject:** Pre-Suit Notification of Federal Telemarketing Law Violation

**ATTN: LEGAL DEPARTMENT**

**Hi, my name is Andrew Heidarpour from Heidarpour Law Firm, PLLC. I am sending this correspondence on behalf of my client. Please review it at your earliest convenience.**

**Thank you**

----

Andrew Heidarpour  
Heidarpour Law Firm, PLLC  
[www.HLFirm.com](http://www.HLFirm.com)  
[AHeidarpour@HLFirm.com](mailto:AHeidarpour@HLFirm.com)  
[P] [202-234-2727](tel:202-234-2727)

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--

Best Regards,

Emil Yashayev  
Chief Financial Officer  
Direct: 718-864-1216 | Fax: 800-660-5292  
[Emil@centuryrelief.com](mailto:Emil@centuryrelief.com) | [www.centuryrelief.com](http://www.centuryrelief.com)

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**Josh Thomas <joshualthomas@gmail.com>** 12:07 PM (50 minutes ago)

to Robert

Got both thanks.

Joshua Thomas, Esq.

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**From:** Andrew Heidarpour

**Sent:** Tuesday, April 14, 2020 1:56 PM

**To:** [troy@centuryrelief.com](mailto:troy@centuryrelief.com) <troy@centuryrelief.com>; [louis@centuryrelief.com](mailto:louis@centuryrelief.com) <louis@centuryrelief.com>; [adam@centuryrelief.com](mailto:adam@centuryrelief.com) <adam@centuryrelief.com>; [terrell@centuryrelief.com](mailto:terrell@centuryrelief.com) <terrell@centuryrelief.com>

[yrelief.com](http://yrelief.com)>;[grace@centuryrelief.com](mailto:grace@centuryrelief.com) <[grace@centuryrelief.com](mailto:grace@centuryrelief.com)>  
**Subject:** Pre-Suit Notification of Federal Telemarketing Law Violation

**ATTN: LEGAL DEPARTMENT**

**Hi, my name is Andrew Heidarpour from Heidarpour Law Firm, PLLC. I am sending this correspondence on behalf of my client. Please review it at your earliest convenience.**

**Thank you**

----  
Andrew Heidarpour  
Heidarpour Law Firm, PLLC  
[www.HLFirm.com](http://www.HLFirm.com)  
[AHeidarpour@HLFirm.com](mailto:AHeidarpour@HLFirm.com)  
[P] [202-234-2727](tel:202-234-2727)

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--  
Best Regards,

Emil Yashayev  
Chief Financial Officer  
Direct: 718-864-1216 | Fax: 800-660-5292  
[Emil@centuryrelief.com](mailto:Emil@centuryrelief.com) | [www.centuryrelief.com](http://www.centuryrelief.com)

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## **EXHIBIT C**

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| TRACY L WORSHAM            | 4  |
| DEBORAH SCHICK             | 3  |
| DON HILDRE                 | 3  |
| LALA SLOATMAN              | 3  |
| LOUIS JOHNSON              | 3  |
| MARK METZLER               | 3  |
| MELISSA MEYER              | 3  |
| NICOLE L BOETTGER          | 3  |
| SHARON TULLOCH             | 3  |
| THANE CHARMAN              | 3  |
| ABLE HOME HEALTH           | 2  |
| ADRIANA BARBIERI           | 2  |
| ANTHONY ROBINSON           | 2  |
| BRANDON CALLIER            | 2  |
| CANDY WORKMAN              | 2  |
| DANIEL DECLEMENTS          | 2  |
| DARREL DRESSEL             | 2  |
| DAVID WEISBERG             | 2  |
| DEIRDRE MILLER             | 2  |
| ERIKA L GRUENERT           | 2  |
| GEORGE MOORE               | 2  |
| JASON LATHEM               | 2  |
| JAYSON ROGERS              | 2  |
| JENNIFER CARRERA           | 2  |
| JESANIEL MARRERO           | 2  |
| JOHN NICHOLS               | 2  |
| JOSEPH BOND                | 2  |
| JOURNEY NEWELL             | 2  |
| KELLY D CRUMBY             | 2  |
| KIMBERLY SHEARS-BARNES     | 2  |
| LADARRIUS COOLEY           | 2  |
| LAKISHA LONG               | 2  |
| LOUIS FLOYD                | 2  |
| MARK B ARONSON             | 2  |
| MICHAEL C WORSHAM          | 2  |
| MOHAMED ELHENDI            | 2  |
| MONIQUE M WRIGHT           | 2  |
| OUSSAMA ISSA               | 2  |
| PAUL SUSHEREBA             | 2  |
| RYAN TURIZO                | 2  |
| SCOTT M RUNYON             | 2  |
| TASHIA TASCHLER            | 2  |
| WARREN SPIES               | 2  |
| YVETTE GRIFFIN             | 2  |

NUMBER OF CASES IN JAN-MAR